

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>  <hr/> <b>THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
---	---

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss with prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41. Other plaintiffs and defendants remain and the case should remain open. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Clayton A. Clark  
Clayton A. Clark  
Clark Love & Hutson  
440 Louisiana Street  
Suite 1600  
Houston, TX 77002  
(713) 757-1400  
cclark@triallawfirm.com  
*Counsel for Plaintiffs*

/s/ William M. Gage  
William M. Gage (MS Bar #8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 24338  
(304) 414-1800  
srobinson@tcspllc.com  
*Counsel for the Ethicon Defendants*

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

**EXHIBIT A**

Civil Action No.	Case Name	
2:15-cv-05858	Donna Beresford	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Alma Biship	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Gabriela Chavez	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Shirley Coggeshall	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Mary Cook	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Linda Corte	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Nurys Crispin	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Avis Crow	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Sally Dempsey	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Maria Dominguez	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Rosa Maria Ramirez	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Robin Eckholt	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Clyde Ent	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Roseann Glazer	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Beverly Glover	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Robin Gordon	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Nina Gray	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Margaret Grubbs	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Phyllis Hanssen	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Etta Helmstetter	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;

2:15-cv-05858	Elizabeth Henry	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Karen Hernandez	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Mary Jackson	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Regla Jones	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Gloria Kirk	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Angelia Kline	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Diana Kraus	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Maureen Lewis	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Mae Lykens	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Rebecca Maness	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Amanda McCandless	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Mary Morgan	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Karen Neville	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Angela Prater	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Kristen Rea	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Joyce Reese	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Misty Reeves	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Dorothy Reid	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Kal Robertson	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Anita Rogers	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Janet Russo	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Catherine Sak	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Charlotte Santos	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;

2:15-cv-05858	Assunth Schenkel	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Peggy Schwarz	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Glenda Shelton	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Teresa Sikes	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Odette Silvieus	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Sharon Stancher	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Tracey Stewart	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Nancy Stout	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Brenda Stroemple	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Dolores Sugalski	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Dawn Taylor	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Charlotte Tyson	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Nelida Vasquez	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Shela Vermillion	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Susan Warren	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Jerrye Weaver	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Shelia Webb	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Shari Wiesler	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Marian Williams	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Teresa Williamson	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Lisa Wiseman	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Phyllis Wolfe	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
2:15-cv-05858	Terri Yeager	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;

2:15-cv-05858	Molly Zanath	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC;
---------------	--------------	--